

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

CIVIL ACTION NO. 6:21-CV-00128-ADA

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION STATEMENT

I. AGREED CONSTRUCTIONS**a. U.S. Patent No. 8,989,216**

The parties agree to the following construction for U.S. Patent No. 8,989,216 and respectfully request that the Court enter the parties' agreed construction.

Claim Language	Agreed Construction
"context" (Cls. 1, 2, 4, 5, 7, 9, 11, 12, 13, 14)	Plain and ordinary meaning (<i>i.e.</i> , the situation in which a default definition or standard does not apply)

II. DISPUTED CONSTRUCTIONS**a. U.S. Patent No. 7,443,859****i. "APN (Access Point Name) field" / "APN field"**

Claim Language	Brazos's Construction	Cisco's Construction
"APN (Access Point Name) field" / "APN field" (Cls. 1-5, 7, 9-11, 15-17, 22-24, 26) [Cisco proposed]	Plain and ordinary meaning	Specific field identified as "Access Point Name" that contains the name of the access point

ii. "explicitly indicates requesting either a private network address or a public network address"

Claim Language	Brazos's Construction	Cisco's Construction
"explicitly indicates requesting either a private network address or a public network address" (Cls. 1, 8-11, 15, 21-24, 26) [Cisco proposed]	Plain and ordinary meaning	Plain and ordinary meaning (particular bit or bits indicate requesting either a private or public network address, rather than determining the desired public or private assignment based upon the indicated access point)

iii. *“a private network address”*

Claim Language	Brazos’s Construction	Cisco’s Construction
“a private network address” (Cls. 1-5, 7-11, 15-17, 21-24, 26) [Both parties proposed]	Plain and ordinary meaning	An address that is only visible within the network that assigned it

b. U.S. Patent No. 8,191,106

i. *“inter-technology change-off monitoring entity (ICME)” / “ICME”*

Claim Language	Brazos’s Construction	Cisco’s Construction
“inter-technology change-off monitoring entity (ICME)” / “ICME” (Cls. 1, 5-7, 10) [Cisco proposed]	Plain and ordinary meaning Alternatively, “hardware and/or software which monitors one or more access types”	Entity that monitors the type of technology being used to access the converged network

ii. *“converged network”*

Claim Language	Brazos’s Construction	Cisco’s Construction
“converged network” (Cls. 1, 10) [Cisco proposed]	Plain and ordinary meaning	Network with a common core that supports multiple access technologies including both fixed and mobile access technologies

c. U.S. Patent No. 8,989,216

i. *“said specific context” / “said context”*

Claim Language	Brazos’s Construction	Cisco’s Construction
“said specific context” / “said context” (Cls. 2, 5, 7, 9) [Cisco proposed]	Plain and ordinary meaning	Indefinite

ii. “said command or AVP is defined by a second default definition”

Claim Language	Brazos’s Construction	Cisco’s Construction
“said command or AVP is defined by a second default definition” (Cl. 4) [Cisco proposed]	Plain and ordinary meaning	Indefinite

d. U.S. Patent No. 9,357,014

i. “connected services layer”

Claim Language	Brazos’s Construction	Cisco’s Construction
“connected services layer” (Cls. 1, 3-9, 12, 13, 15, 18, 19) [Cisco proposed]	Plain and ordinary meaning Alternatively, “a layer that supports establishment of a service connection”	a layer that supports a service connection between two endpoints

ii. “service name of the connected services layer”

Claim Language	Brazos’s Construction	Cisco’s Construction
“service name of the connected services layer” (Cls. 1, 18, 19) [Cisco proposed]	Plain and ordinary meaning	service name of the requesting connected services layer

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Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that on December 2, 2021, a true and correct copy of the above and foregoing instrument was e-filed with the Court and e-served upon all counsel of record using the Court's Electronic Filing Service Provider in accordance with Rule 21(a)(1) of the Texas Rules of Civil Procedure and by electronic mail as indicated below.

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